

LTV Steel Company

RESPONSE TO 3/22/88 CIL.

LTV

May 10, 1988

Michael J. Thomas  
Environmental Coordinator  
LTV Steel Company  
11600 So. Burley Avenue  
Chicago, IL 60617  
312/933-4522 or  
219/391-2840

Angela Aye Tin, Manager  
Technical Compliance Unit  
Compliance Section  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
2200 Churchill Road  
Post Office Box 19276  
Springfield, Illinois 62794-9276

EPA Region 5 Records Ctr.



307748

Re: 0316500002 - Cook County  
LTV Steel Company  
ILD 056623598  
Compliance File

Dear Ms. Tin:

In reply to the subject Compliance Inquiry letter the following corrective action has been taken to resolve the apparent violations identified in your attachment "A".

A revised training plan has been written and implemented.

A copy of the plan is attached. This plan includes job titles of position's related to hazardous waste management, job descriptions, a description of the training to be conducted and a form for recording the required training. These records are maintained at our facility.

continued.....

RECEIVED  
MAY 13 1988  
IEPA-DLPC

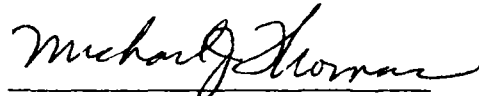
Re: 031650002 - Cook County  
LTV Steel Company  
ILD 056623598  
Compliance File  
PAGE 2 of 2

Your reference to apparent violations found in previous inspections being found again does not seem to be supported by the inspection report we received. No apparent violations were specified during the previous inspection regarding training.

If you have any further questions, please contact the writer.

Very truly yours,

LTV STEEL COMPANY



Michael J. Thomas  
Environmental Coordinator  
Chicago Works

MJT:mz

cc: R. Finley  
IEPA Maywood, IL

encl.

bcc: C. Broman  
T.A. Dockus  
B.R. Norris  
L.A. Szuhay  
file

LTV STEEL COMPANY  
SOUTH CHICAGO WORKS

RESOURCE CONSERVATION AND RECOVERY ACT  
PERSONNEL TRAINING PLAN

265.16

Introduction

All personnel whose normal duties involve the handling of the hazardous wastes generated at the South Chicago Works will be trained in the following procedures within six months of assignment and annually thereafter. This program will be executed under the direction of the Safety Coordinator and the Superintendent of Environmental Control.

Conduct of Training

Safety/Environmental Control will conduct training of all General Supervisors whose responsibility includes facilities that generate hazardous waste, and those positions who have responsibilities defined in the RCRA Contingency Plan. Those positions include the following:

Superintendent, Environmental Control Dept.

Works Safety Coordinator

Environmental Engineers

Environmental Engineer Bar Division

Supervisor Water Treatment

Supervisor Wire Mill Cleaning House

General Foreman By-Products

Supervisor AKJ Process

The above personnel are responsible for conducting the training for their subordinate personnel and where applicable including appropriate procedures in departmental Job Safety Analysis (J.S.A.'s).

Content of Training (Training Outline Attached)

1. Identification of hazardous waste.
2. Hazards involved.
3. Protective clothing or equipment required.
4. Hazardous Waste Manifest requirements.
5. Responsibilities in the event of a release, fire, explosion or incident as stated in the RCRA Contingency Plan.

Training Records

A chronological record of training will be maintained by the individual conducting the training. This record must include; individual trained, job, title, and date of training. The attached form may be used in conjunction with the individuals Safety Control Card.

Distribution

A copy of the RCRA Personnel Training Plan will be distributed to the following individuals:

Superintendent, Environmental Control  
Manager, Maintenance & Services  
Manager, 11" Bar Mill  
Manager, Coke Plant  
Environmental Engineers  
Environmental Engineer Bar Division

Distribution (cont'd)

Supervisor Water Treatment

Supervisor Wire Mill Cleaning House

General Foreman By-Products

Supervisor AKJ Process

Works Safety Coordinator

Corporate Manager Solid Waste

MJT:mz

## RCRA PERSONNEL TRAINING RECORD

1. Job Title: \_\_\_\_\_
2. Employee Name: \_\_\_\_\_
3. Job Description: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

4. Description of Training:
- a. Identification of hazardous wastes.
  - b. Hazards involved.
  - c. Protective clothing or equipment required.
  - d. Hazardous Waste Manifest requirements.
  - e. Responsibilities in the event of a release, fire, explosion or incident as stated in the RCRA Contingency Plan.

- ## 5. Log of Training:

[illegible]

Training Outline

1. Identification of Hazardous Wastes

- a. Characteristics of Hazardous Wastes
- b. Hazardous Waste from non-specific sources
- c. Basis for listing hazardous wastes
- d. Hazardous Waste from specific sources

2. South Chicago Works Hazardous Wastes

<u>Mill Area</u>	<u>DOT Shipping Name</u>	<u>Waste Number</u>
Wire Mill Cleaning House	RQ Waste Sulphuric Acid, Spent, Corrosive ORM-E UN1832	K062 F2
Plant General	RQ Waste Petroleum Naphtha Combustible Liquid UN1255	D001 K
Coke Plant By-Products	Decanter Tar Sludge	K087 E

3. Individual protective measures for personnel working with hazardous wastes will be defined in departmental Job Safety Analysis

(J.S.A.'s) and can include the following:

- a. Personal hygiene requirements
- b. Face shields
- c. Rubber boots, gloves and aprons

4. Hazardous Waste Manifest Requirements.

5. RCRA Contingency Plan.